REMARKS

Claims 1-14, 22-27 and 29-35 are currently pending in the subject application and are presently under consideration. Claims 1 and 22 have been amended herein to emphasize various novel aspects of the invention

Favorable reconsideration of the subject patent application is respectfully requested in view of the amendments and comments herein.

I. Rejection of Claims 1-14 Under 35 U.S.C. §103(a)

Claims 1-14 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Tjandrasuwita (U.S. 6,198,469) in view of Reddy, *et al.* (U.S. 6,215,459) and Hannah (U.S. 5,568,192.

Applicants' representative respectfully requests withdrawal of this rejection for at least the following reasons. Neither Tjandrasuwita, Reddy, *et al.*, nor Hannah alone or in combination teach or suggest the claimed invention.

> To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) ***must teach or suggest all the claim limitations***. *See* MPEP §706.02(j). The ***teaching or suggestion to make the claimed combination*** and the reasonable expectation of success ***must both be found in the prior art and not based on applicant's disclosure.*** *See In re Vaeck,* 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991) (emphasis added).

In particular, independent claim 1 recites a programmable grayscale generator to generate grayscale formatted data ***concurrently*** for a plurality of disparate display types and formats. Tjandrasuwita simply teaches a modulation method to generate grayscale from a single input color data- Tjandrasuwita does not teach or suggest ***generating grayscale formatted data concurrently for a plurality of disparate display types and formats*** as in applicants' claimed invention. Although Tjandrasuwita refers to an STN module 207 and a TFT module 206, the

two are not utilized *concurrently*. Tjandrasuwita states that the two data paths of TFT module 206 and STN module 207 "receive data from a single source and operate (*e.g.*, process and propagate data) ***mutually exclusively of each other***." (*See* col. 5, lines 20-23 and col. 6, lines 13-14). By emphasizing the exclusivity and separate internal data paths, Tjandrasuwita clearly discloses a gray scaling logic for either a STN module ***or*** a TFT module- not both. Nowhere in Tjandrasuwita is disclosed grayscale formatted data ***concurrently generated for a plurality*** of disparate display types and formats.

Moreover, Tjandrasuwita teaches away from applicants' claimed invention. Prior art must be considered in its entirety, including disclosures that teach away from the claims.

> A prior art reference must be considered in its entirety, i.e., as a whole, including portions that would lead away from the claimed invention. *W.L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983), *cert. denied*, 469 U.S. 851 (1984). Moreover, the Federal Circuit has held that teaching away from the art of the subject invention is a *per se* demonstration of lack of prima facie obviousness. *In re Dow Chemical Co.*, 837 F.2d 469, 5 USPQ2d 1529 (Fed. Cir. 1988).

Specifically, Tjandrasuwita states "Because TFT module 206 and STN module 207 are designed to function mutually exclusive of one another, ***except for some unforeseeable error condition***" (*See* Col. 6, lines 23-25 (emphasis added); *See also* col. 5, lines 20-23 and col. 6, lines 13-14). Hence, one of ordinary skill in the art would not have been motivated by Tjandrasuwita to ***generate grayscale formatted data concurrently for a plurality*** of disparate display types and formats as in applicants' subject invention.

Additionally, claim 1 employs ***a pixel shifting logic system***. Tjandrasuwita, Reddy, *et al.* nor Hannah teach or suggest a pixel shifting logic system as claimed in applicants' invention.

> Applicant may be his or her own lexicographer as long as the meaning assigned to the term is not repugnant to the term's well known usage. *In re Hill*, 161 F.2d 367, 73 USPQ 482 (CCPA 1947). Any special meaning assigned to a term "must be sufficiently clear in the specification that any departure from common usage would be so understood by a person of experience in the field of the invention." *Multiform Desiccants Inc. v. Medzam Ltd.*, 133 F.3d 1473, 1477, 45 USPQ2d 1429, 1432 (Fed. Cir. 1998).

As recited in applicants' application, "the pixel shifting logic system allows for reduced external data and clock rates by performing multiple pixel transfers in parallel." (*See* Application, pg. 36 lines 19-30 through pg. 37 lines 1-3). Nowhere in Tjandrasuwita, Reddy, *et al.* nor Hannah is a pixel shifting logic system taught or suggested ***as recited*** in applicants' subject invention.

In view of at least the aforementioned reasons, the subject invention as recited in independent claim 1 (of which claims 2-14 respectively depend upon) is not obvious over Tjandrasuwita, Reddy, *et al.* and Hannah taken individually or in combination. Accordingly, this rejection should be withdrawn.

II. Rejection of Claims 22-27 and 30-35 Under 35 U.S.C. §103(a)

Claims 22-27 and 30-35 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Tjandrasuwita in view of Reddy, *et al.* and Dye (U.S. 4,965,559).

As stated *supra*, neither Tjandrasuwita nor Reddy, *et al.* alone or in combination teach or suggest applicants' invention as recited in independent claims 1 and 22 (of which claims 23-27 and 30-35 depend there from). Neither Tjandrasuwita nor Reddy, *et al.* teach or suggest ***generating grayscale formatted data concurrently for a plurality of disparate display types and formats*** as in applicants' claimed invention. Moreover, Dye does not cure the aforementioned deficiencies of Tjandrasuwita and Reddy, *et al.*

In view of at least the foregoing, applicants' invention as recited in independent claims 1 and 22 (of which claims 23-27 and 30-35 depend upon) is not obvious over the cited art. Accordingly, withdrawal of this rejection and allowance of claims 22-27 and 30-35 is respectfully requested.

III. Rejection of Claim 29 Under 35 U.S.C. §103(a)

Claim 29 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Tjandrasuwita in view of Reddy, *et al.*, Hannah, and Dye.

Claim 29 depends from independent claim 22. As stated *supra*, Tjandrasuwita, Reddy, and Hannah do not teach or suggest applicants' invention as recited in this independent claim; and Dye does not cure the aforementioned deficiencies of these primary references. Accordingly, this rejection should be withdrawn.

Conclusion

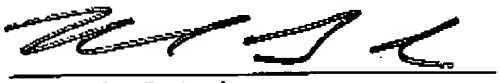
The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

AMIN & TUROCY, LLP



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